## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION

UNITED STATES OF AMERICA, \*

vs. \*

SANDRA ANDERSON, et al., \* CASE NO. 4:20-CR-32 (CDL)

Defendants. \*

## ORDER

Under the protective order and the Rule 502 order issued in this action, several exhibits to filings in this action are restricted to case participants and Court users. The Rule 502 order states that "the defendants shall not reference or use any of the [restricted] Materials in a public filing or in open court without prior permission from the Court." Rule 502 Order at 2, ECF No. 144.

Defendant Sandra Anderson filed a motion to modify the protective order and the Rule 502 order to permit public access to the following documents that are presently restricted: ECF Nos. 173, 173-2, 173-3, 173-4, and 201-1 to 201-23. The Government does not object to modifying the protective order to permit public disclosure of certain exhibits to an evidentiary hearing that was held on August 10, 2022: ECF Nos. 201-3, 201-4, 201-14, 201-15, 201-19, 201-20, 201-21, 201-22, and 201-23. According to the Government, these documents are already in the public domain and

thus need not be protected. The Court grants Anderson's motion to the extent that these documents may be unsealed.

The Court denies Anderson's motion to unseal the remaining documents, which contain privileged attorney work-product material. Anderson did not cite any legal authority supporting modification of the protective order or the Rule 502 Order, and she did not state another basis for unsealing the documents. She also did not explain why it is necessary to unseal these documents so she may pursue her appeal. Furthermore, if the Court of Appeals finds that these documents should be unsealed for appeal purposes, it has the authority to do so. Accordingly, this portion of Anderson's motion is denied.

## CONCLUSION

As discussed above, Anderson's motion to unseal (ECF No. 318) is granted to the extent that the following documents may be unsealed: ECF Nos. 201-3, 201-4, 201-14, 201-15, 201-19, 201-20, 201-21, 201-22, and 201-23. The motion is otherwise denied.

IT IS SO ORDERED, this 2nd day of October, 2023.

S/Clay D. Land

CLAY D. LAND

U.S. DISTRICT COURT JUDGE

MIDDLE DISTRICT OF GEORGIA